



South Coast Air Quality Management District

Engineering & Compliance

*Policies &
Procedures*

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

MEMORANDUM

DATE: August 9, 1989
TO: All Processing Engineers
FROM: William J. Dennison /s/ WJD
SUBJECT: Implementation of Rule 1404: Hexavalent Chromium Emissions from Cooling Towers

Rule 1404 requires owners/operators of cooling towers to eliminate the use of hexavalent chromium additives to their cooling tower water and to test periodically to ensure that the content of hexavalent chromium is below the threshold values specified in the Rule. In addition, Rule 1404 requires all cooling tower operators to submit a compliance plan. The exemptions in the rule apply only to the testing requirements. A separate compliance plan is required for each non-exempt cooling tower. However, all exempt cooling towers at one facility may apply under one plan.

Since compliance with Rule 1404 [Section (b)(1): "On and after January 1, 1990, hexavalent chromium containing water treatment chemicals shall not be added to the cooling tower circulating water".] should reduce Cr+6 to essentially zero, permits to operate cooling towers would not be necessary as Rule 219(d)(3) exempts cooling towers not used to cool process water "...in which no chromium compounds are contained..."

Therefore, in response to inquiries, the only application we would need for cooling towers of non-process water is an application for the compliance plan. These applications will be directed to the 219 Unit. For further assistance, please contact Tran Vo.

DS:as018
cc: Lee Lockie
Pang Mueller
Arnie Stein